Remarks

This application has been reviewed in light of the Office Action dated July 3, 2006. Claims 13-15, 17-42 and 45-61 are pending in this application. Claims 1 –12 were withdrawn. Claims 16, 43 and 44 were previously canceled. Claims 14, 15, 17, 19, 21, 25, 27, 30-32, 34, 36, 41, 42, 45, 47 -50, 52, 53, 55, 57, 59 and 60 has been amended to define still more clearly what Applicants regard as their invention. Claims 13, 19, 21, 27, 36, 45, 50 and 55 are in independent form. Favorable reconsideration is respectfully requested.

The Examiner is thanked for the indication that Claims 13-15, 17, 18, 21-25, 27-31, 34-42, 45-49 and 55-61 are allowed.

Claims 19-20, 26 and 50-52 were rejected under 35 U.S.C. §102(e) as being anticipated by Schneider et al., U.S. Patent No. 6,222,551 (Schneider). During a telephone interview with the Examiner on October 27, 2006, the Examiner acknowledged that Schneider did not anticipate claims 19-20, 26 and 50-52. The Examiner agreed to withdraw this rejection.

During the telephone interview, the Examiner indicated that he had uncovered a reference that he felt was art that allegedly anticipated claim 19. On November 30, 2006, during a telephone conference with Applicants' representative, the Examiner stated that the art was Chen, et al., U.S. Patent No. 5,888,098 ("Chen"). Applicants respectfully disagree that Chen anticipates.

Chen discloses a method and apparatus, which provides for a 3-D bounding region wherein the 3-D bounding region has sensitive areas which the user can select with a reference pointer. *See* Abstract.

16

Upon selection of a 3-D object, the object becomes enclosed by a bounding box (col. 5, lines 10-15). Further, the bounding region allows for direct manipulation of the enclosed 3-D object (col. 5, lines 16 – 18). For example, a bounding box 305 with hands embodiment tells the user which manipulations are possible with the selected object. The bounding box allows direct manipulation based on the identified manipulation possible depending on the bounding box (col. 5, lines 61-63). Thus, the type of manipulation is determined by the bounding box. Moreover, the mouse is used to drag the mouse pointer and select the 3-D object to be bound (col. 5, lines 32-36).

However, Chen neither teaches nor suggests, for example, the elements of rotating the three-dimensional model to present a first one of the views, said views comprising views generated based on the three-dimensional model; automatically pausing to show the first one of the views, wherein the first one of the views is the representation of the three-dimensional model from the predetermined viewpoint that correlates with a first orientation of the rotated three-dimensional model; and continuously rotating and automatically pausing the model to present other ones of the views, wherein the other ones of the views of the three-dimensional model are representations of the three-dimensional model from predetermined viewpoints that correlate with other orientations of the rotated three-dimensional model.

Moreover, Chen teaches *away* from Applicants' invention because it requires a bounding box to determine the type of manipulation. The operation, of scaling, moving or rotating, is chosen by the user and is determined by preset areas, such as active zones 401 (col. 7, lines 53-55). Thus, Chen does not teach or suggest Applicants' invention. Therefore, Applicants respectfully submit that claim 19, as amended, as well as the remaining claims are patentable and should be allowed.

A review of the art of record has failed to reveal anything that, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as applied against the independent claims herein. Therefore, those claims are respectfully submitted to be patentable over the art of record. It is respectfully requested that the Examiner withdraw the claim rejections and allow the claims.

The other rejected claims in this application depend from one or another of amended independent claims, discussed above and, therefore, are submitted to be patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, individual consideration or reconsideration, as the case may be, of the patentability of each claim on its own merits is respectfully requested.

INTERVIEW SUMMARY

A telephone interview with Examiner Nguyen was held on October 27, 2006. Claims 19-21 and U.S. Patent Nos. 6,222,551 and 5,588,098 were discussed. The Examiner stated, in his Interview Summary, that agreement with respect to the claims was reached. In particular, the Examiner stated that "[o]n the rejection based on the reference 6,222,551, after Applicant's Representative explains, Examiner agrees the act of 'pausing' does not clearly showed in the reference, however, Examiner expresses some concerns related to the reference 5,588,098. Examiner agrees that the claim 19, if amended to include the allowed feature of claim 21, would be allowable over the cited reference."

Applicants believe claim 19, as amended, overcomes the cited reference, without the

need to include the limitation in claim 21. As such, Applicants respectfully submit that claim 19,

as amended, is in condition for allowance.

CONCLUSION

Claims 13-15, 17-42 and 45-61 are now pending. Accordingly, it is respectfully submitted that all pending claims are in condition for allowance. Applicants respectfully request that all pending claims be allowed.

Please charge any additional fees for this Amendment or credit any overpayments to Deposit Account No. 50-0521.

Respectfully submitted,

Date: December 4, 2006

Chandana R. Rao
Reg No. 52,150

Clifford Chance US LLP
31 West 52nd Street
New York, NY 10019-3107
Telephone: (212) 878-3107